

IN THE NORTHERN DISTRICT OF OHIO
THE UNITED STATES DISTRICT COURT
EASTERN DIVISION

UNITED STATES of AMERICA
Plaintiff

V

Christian Ferguson,
Defendant

}
} Case No. 15-20CR262
}
} Judge Solomon Oliver Jr.
}
}
} Supplementary Bail
} Motion Hearing
} 18 U.S.C.S 3142
} Section B
} Section C [i] [A] [B]
} [ii] [iv] [v] [viii] [ix]

I Christian Ferguson request that this honorable court grant this motion for a bail hearing, thus, subsequently granting me a release from detention forthwith as provided by statute 18 U.S.C.S 3142 Section B, Section C (1) (A) (B) [i] [iv] [v] [viii] [ix]. Upon granting of this motion and release from detention, I Christian Ferguson would agree to comply with any and all arrangements, restrictions, requirements, obligations and instructions prescribed by the court.

LAW

18 U.S.C.S. 3142(b) states: Release on personal recognizance bond or unsecured bond; The judicial officer shall order pre-trial release of the person on personal recognizance or upon execution of an unsecured appearance bond in an amount specified by the court, Subsection to the condition that the person

not commit a federal, state, or local crime during the period of release subject to crime during the period of release subject to the condition that the person cooperate in the collection of DNA sample from the person if the collection of such sample is authorized pursuant to section 3 of the DNA analysis backlog elimination act of 2000, [212032, 12135a], Unless the judicial officer determines that such release will not reasonably assure the appearance of the person as required will not reasonably assure the appearance of the person as required or will not endanger the safety of any other person or ~~the~~ the Community

18 U.S.C.S. 3122 (c) States: Such person shall be released on a condition or combination of conditions under subsection [c] (1) (A) (B) [i] [ii] [iv] [v] [vi] [vii] [ix]

United States of America V. Paul M. LaLonde
2246 F. Supp 2d 873; 2003 Case No 1-02-168
[6th Cir] — See also: U.S. V. Timothy
Louis Hudspeth et al 173 F Supp 2d 32;

ARGUMENT

The history and characteristics of the defendant supports the unlikelyhood that he will flee and or abscond from justice. He has always appeared at any court proceeding in the past. I grew up in Cleveland, Ohio and recieved a Scholarship to Ivy tech to recieve training for Automotive. The reason I moved back to Cleveland was that I lost my job at Ford Motor Company, I only had \$650.00 and my rent was overdue and my Father Sheldon agreeded to take me in to help me get back on my feet. Much charge in Indiana in which the DA mistakenly stating saying are multiple charges is a single charge for resisting arrest was dropped to a misconduct. I have to ~~appear~~ appear to have my case settled and sealed. I have appeared before and never tried to run. Another reason I say I can prove I am not a risk. Supposed release or home confinement is it

deemed the only way. I have tried to have my attorney have a meeting either videocon or telephone to discuss my defence. I have stated in the interview that took place on my arrest I want to have no part in the 75th Spartans anymore. I have told the people in the chat logs we will not be doing this. I have been trying to be able to prove this but I have not had the chance to put up my defence. I am not a violent person and do not want to do any type of uprising. As the court knows I have and is still trying to pursue a career in the U.S. Army. I applied and was only medically dq and was told to wait 2 years until reapplying back in 2018. I'm attending M-C's automotive classes so I can receive my ASE certifications so that I can move up in automotive world as a mechanic. I'm praying that I can prove my innocence so that I can put this behind me so I may try and reapply for the duty for the job as a 2 wheeled mechanic. I been playing Call of duty since I was kid waiting for my 18th birthday so I can join the 75th Rangers Regiment. The reason I was in the online militia was it was a theme meme in march. I have proof of the entrapment that this case is based on. The Special Agent Kirk Dierker who was the solicitor of this tried to have me alter my AR-15 style rifle by cutting the barrel. On the Discord app I told him I rather not do so and just go to a gunsmith and do a legal top rail but whoever "guinness" truly is but then he also tried to get me to buy a gun with a serial number sawed off. He told me that his son could do it and then he said he knew a guy who could. In discovery the conversation has alot of overlapping voices in it and the Plaintiffs is not showing the full picture. I even said on the record "I don't really want to be in this anymore." The Grounds on which I'm saying that I need temporary release is so I can bring forth my evidence since the appointed lawyer "I have Carol Kucherski" is refusing to do any more work. In my last motion she neglected to bring up my character and

history. Without me getting a chance to prove my side the case is built against me with no way to show the full true picture. The CHS guiness wanted me to do the allegory to ~~my~~ my note so they could build a long case against me. I have it stated on discord to multiple people we are not or ever going through with the plan. Guinness told me he could teach me how to perform Judo and Banger-tactics. He told me he would only show me training & he believed I was serious and not just a kid talking about the army. I have been trying to get in the military since I was 12 and with the Covid-19 the recruiter I was talking to told me I will have to wait until June since his office was closed. I been doing the 2 mile run within 12 minutes. I can and will show you the proof as long as the FBI have never deleted or corrupted my discord I have the statements I made and everything that the ~~FBI~~ ~~Saled~~ ~~to~~ include in my discovery. In my situation I being caged while dirt is thrown on me then I'm asked "why are you so filthy" When I never had a chance to defend or ~~to~~ clean myself. I would also like to reappoint Carol Kugarski for a new public defender.

Respectfully Submitted
NAME: Christian Ferguson

Signature: *Christian Ferguson*

Certificate of Service


I certify that a true and correct copy of this said pro se motion should be copied by the clerk of courts and given and furnished to the Honorable Judge: Oliver and to the AUSA for the purpose filed pro se

Respectfully Submitted

Name: Christian Ferguson

Signature: 

Sworn to and subscribed to before me, Christine Miller, a notary public for the State of Ohio, on this 4th day of September, 2020.


My Commission Expires: 12/20/2022

